

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**TENTH INTERIM FEE APPLICATION OF FTI CONSULTING, INC. FOR
COMPENSATION EARNED AND EXPENSES INCURRED FOR THE PERIOD FROM
SEPTEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

Name of Applicant:	FTI Consulting, Inc.
Name of Client:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Period for which Compensation and Expense Reimbursement Are Sought in this Application:	September 1, 2022 through December 31, 2022
Petition Date:	September 16, 2019
Retention Date:	December 2, 2019, <i>nunc pro tunc</i> to September 19, 2019
Total Amount of Compensation and Expense Reimbursement Sought to be Allowed in this Application:	\$156,629.50
Total Amount of Compensation Sought to be Allowed in this Application:	\$156,621.50
Total Amount of Expense Reimbursement Sought to be Allowed in this Application:	\$8.00

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifesciences Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Total Amount of Compensation and Expense Reimbursement Previously Allowed Pursuant to the Interim Compensation Order:	\$91,561.20
Compensation Sought in this Application and Already Paid Pursuant to the Interim Compensation Order:	\$42,575.20
Expenses Sought in this Application and Already Paid Pursuant to the Interim Compensation Order:	\$8.00
Blended Hourly Rate of Included Professionals:	\$985.66
Number of Professionals Included in This Application:	5

This is a: ____ monthly interim ____ final application

FTI Consulting, Inc. (together with its wholly owned subsidiaries and independent contractors, (“FTI”) financial advisor to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “Committee”) of Purdue Pharma L.P., et al. (the “Debtors”), hereby makes its Tenth Interim Fee Application for Compensation Earned and Expenses Incurred for the Period from September 1, 2022 through December 31, 2022 (this “Application”) and respectfully represents as follows:

Introduction

1. FTI provided services to the Committee in accordance with the instructions and directions of the Committee. FTI is compensated on an hourly fee basis, plus reimbursement of actual and necessary expenses incurred by FTI.

2. By this Application, FTI seeks allowance of (i) compensation for actual and necessary professional services rendered by FTI as financial advisor to the Committee for the period from September 1, 2022 through December 31, 2022 (the “Compensation Period”) in the

amount of \$156,621.50 and (ii) reimbursement for expenses incurred in the Compensation Period in the amount of \$8.00, for a total of \$156,629.50 for the Compensation Period.

3. The statutory bases for the relief requested herein are sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), and the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases, effective as of November 1, 2013 (the “U.S. Trustee Guidelines”). This Application has been prepared in accordance with General Order M-447, the Amended Guidelines for Fees and *Disbursements for Professionals in the Southern District of New York* (June 17, 2013) promulgated pursuant to Local Bankruptcy Rule 2016-1(a) (the “Local Guidelines”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “Interim Compensation Order”).

4. This Application summarizes the services rendered by FTI on behalf of the Committee during the Compensation Period. While it is not possible or practical to describe each and every activity undertaken by FTI, FTI has maintained contemporaneous time records which include a detailed chronology of the daily services rendered, describing the precise nature of the work, the specific tasks performed, and the time expended by each professional. A breakdown of the hours and fees by professional is annexed hereto as **Exhibit A**. A breakdown of the hours and fees by task code is annexed hereto as **Exhibit B**. A detailed copy of the time records for the Compensation Period is annexed hereto as **Exhibit C**.

5. FTI has incurred out-of-pocket disbursements during the Compensation Period broken down into categories of charges itemized in **Exhibit D**. A detailed breakdown of these charges is annexed hereto as **Exhibit E**. Each charge incurred by FTI was necessary and reasonable and was incurred as a direct result of FTI's representation of the Committee.

6. In accordance with the Interim Compensation Order, FTI has requested payment for 80% of the fees for actual and necessary services incurred during the Compensation Period in the amount of \$125,297.20 and for 100% of the expenses incurred during the Compensation Period in the amount of \$8.00 for a total amount of \$125,305.20. FTI submitted monthly fee statements during the Compensation Period, summarized as follows:

		Fees and Expenses Incurred			Monthly Amounts Previously Requested	Payments Received as of the Date of this Application	Total Fees and Expenses Owed
Docket No./Filed	Compensation Period	Fees (100%)	Fees (80%)	Expenses (100%)	Fees (80%) + Expenses (100%)		
Docket No. 5240 Filed on 11/15/2022	September 1, 2022 - September 30, 2022	\$ 53,219.00	\$ 42,575.20	\$ 8.00	\$ 42,583.20	\$ 42,583.20	\$ 10,643.80
Docket No. 5341 Filed on 1/13/2023	October 1, 2022 - October 31, 2022	30,107.50	24,086.00	-	24,086.00	-	30,107.50
Docket No. 5342 Filed on 1/13/2023	November 1, 2022 - November 30, 2022	31,105.00	24,884.00	-	24,884.00	-	31,105.00
Docket No. 5393 Filed on 2/1/2023	December 1, 2022 - December 31, 2022	42,190.00	33,752.00	-	33,752.00	-	42,190.00
Total		\$ 156,621.50	\$ 125,297.20	\$ 8.00	\$ 125,305.20	\$ 42,583.20	\$ 114,046.30

7. As of the date of this Application, FTI is owed \$114,046.30 for professional fees and \$0.00 for actual and necessary expenses for a total of \$114,046.30.

Jurisdiction

8. The Court has jurisdiction over this Application under 28 U.S.C. § 1334. Venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

Background

9. On September 16, 2019 (the "**Petition Date**"), the Debtors each filed with the United States Bankruptcy Court for the Southern District of New York (this "**Court**") their

voluntary petitions for relief under chapter 11 of the Bankruptcy Code. For the bankruptcy process, the Debtors selected Davis Polk & Wardwell as counsel (“**Davis Polk**”) and AlixPartners LLP as financial advisor (“**Alix**”).

10. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

11. On September 18, 2019, the Court entered an order [Docket No. 59] authorizing the joint administration and procedural consolidation of the Debtors’ chapter 11 cases pursuant to Bankruptcy Rule 1015(b). No examiner has been appointed in the chapter 11 cases pursuant to section 1104 of the Bankruptcy Code.

12. On November 21, 2019, the Court entered its Interim Compensation Order [Docket No. 529] establishing the procedures for interim compensation and reimbursement of expenses incurred by professionals retained by the Debtors pursuant to sections 327 or 1103 of the Bankruptcy Code (“**Retained Professionals**”).

13. On December 2, 2019, the Court entered the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [Docket No. 553] (the “**Retention Order**”).

14. During the Compensation Period, FTI has represented the Committee, in connection with these chapter 11 cases, including with respect to, among other things, the Debtors’ domestic and international business plans, employee compensation plans, and historical cash transfers. The fees earned and the expenses incurred by FTI in connection with these activities are the subject of this Application and are described in more detail below and the exhibits hereto.

Terms and Conditions of Employment

15. FTI is compensated on an hourly fee basis, plus reimbursement of actual and necessary expenses incurred by FTI. For further information regarding the terms and conditions of FTI's retention, please see the Retention Order. The Committee has been given the opportunity to review and approve this Application.

Summary of FTI's Services Rendered

16. During the Compensation Period, FTI provided extensive financial services to the Committee. The primary services rendered by FTI include, but are not limited to, the categories set forth below (each a "**Task Code**") which were billed pursuant to the requirements of Section C(8)(c) of the U.S. Trustee Guidelines:

- a. **Task Code 1: Current Operating Results & Events (38.9 Hours):** During the Compensation Period, time detail under this task code related to FTI's work evaluating the Debtors' monthly operating reports, results, and current events. FTI prepared analyses comparing the Debtors' YTD performance relative to their business plans and prepared presentations to share findings and update the Committee.
- b. **Task Code 7: Analysis of Domestic Business Plan (78.3 Hours):** During the Compensation Period, time detail under this task code relates to FTI's work evaluating the Debtors' revised go-forward business plan and the cost projections within the business plan forecast. FTI participated on calls with the Debtors' advisors to discuss the business plan forecast and various operating updates that could impact the business plan. FTI prepared various analyses and presentations to the Committee regarding (i) the Debtors' Public Health

Initiatives, (ii) ongoing patent litigation and the potential impact to business plan forecasts, and (iii) Avrio operating updates.

Basis for Relief Requested

17. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code that govern the Court's award of such compensation. See 11 U.S.C. § 331. Section 330 provides that the Court may award a professional employed under section 327 "reasonable compensation for actual, necessary services" and "reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330(a)(3) also outlines specific criteria that the Court shall consider in determining the amount of reasonable compensation, including:

- a. the time spent on such services;
- b. the rates charged for such services;
- c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- e. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

f. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

18. All of the services for which FTI seeks compensation were necessary for, beneficial to, and in the best interests of the Committee. FTI's fees are reasonable given the size and complexity of the Debtors' cases.

19. All of the services for which interim compensation is sought herein were rendered for and on behalf of the Committee. FTI respectfully submits that the professional services rendered were necessary, appropriate, and have contributed to the effective administration of the Debtors' chapter 11 cases and maximization of value. It is respectfully submitted that the services rendered to the Committee were performed efficiently, effectively, and economically, and the results have benefitted the Committee.

20. The hourly rates that FTI has charged are consistent with the market rate for comparable services. The hourly rates and fees charged by FTI are the same as those generally charged to, and paid by, FTI's other clients. FTI regularly reviews its hourly rates on an annual basis and, accordingly, the rates included in this Application reflect an ordinary course hourly rate increase.

21. Whenever possible, FTI sought to minimize the costs of its services to the Committee by utilizing talented junior professionals to handle more routine aspects of case administration. A small group of the same FTI professionals was utilized for the vast majority of the work in these cases to minimize the costs of intra-FTI communication and education about the Debtors' circumstances.

22. FTI believes that the expenses incurred are reasonable and economical relative to the services required by the Committee and were incurred as a direct result of FTI's representation of the Committee. These expenses are the type customarily charged to non-bankruptcy clients of FTI. None of the expenses relate to non-reimbursable overhead. FTI has adhered to allowable rates for expenses as fixed by 2016-1 of the Local Rules for the United States Bankruptcy Court of the Southern District of New York.

23. In accordance with the factors enumerated in section 331 of the Bankruptcy Code, the amounts requested herein are fair and reasonable given (i) the complexity of the cases, (ii) the time expended, (iii) the nature and extent of services rendered, (iv) the value of such services, and (v) the costs of comparable services other than in a case under the Bankruptcy Code.

24. FTI submits that pursuant to the criteria normally examined in bankruptcy cases and based upon the factors considered in accordance with sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rule 2016, the results achieved provide more than sufficient justification for approval of compensation sought by FTI.

WHEREFORE, FTI respectfully requests that the Court enter an order:

- a. Granting this Application;
- b. Awarding FTI, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$156,621.50 and reimbursement of actual, reasonable and necessary expenses incurred by FTI during the Compensation Period in the amount of \$8.00;

Dated: New York, New York
February 14, 2022

FTI CONSULTING, INC.
Financial Advisors to the Ad Hoc Committee of
Governmental and Other Contingent Litigation
Claimants of Purdue Pharma L.P.

By: */s/ Matthew Diaz*
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EXHIBIT A

PURDUE PHARMA L.P., et al. - CASE NO. 19-23649

SUMMARY OF HOURS BY PROFESSIONAL

FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022

Professional	Position	Specialty	Blended Billing Rate	Total Hours	Total Fees
Diaz, Matthew	Senior Managing Director	Restructuring	\$ 1,287	50.7	\$ 65,227.50
Shafer, Patterson	Managing Director	Healthcare	675	3.7	2,497.50
Bromberg, Brian	Senior Director	Restructuring	932	59.5	55,428.50
Suric, Emil	Senior Director	Healthcare Valuation	907	2.5	2,267.50
Kurtz, Emma	Senior Consultant	Restructuring	734	42.5	31,200.50
Grand Total				158.9	\$ 156,621.50

1. Blended billing rates are presented and reflect ordinary course rate increases.

EXHIBIT B**PURDUE PHARMA L.P., et al. - CASE NO. 19-23649****SUMMARY OF HOURS BY TASK****FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022**

Task Code	Task Description	Total Hours	Total Fees
1	Current Operating Results & Events	38.9	\$ 37,646.00
2	Cash & Liquidity Analysis	3.9	5,005.00
6	Asset Sales	3.8	3,630.00
7	Analysis of Domestic Business Plan	78.3	77,565.00
11	Prepare for and Attend Court Hearings	1.1	1,282.50
16	Analysis, Negotiate and Form of POR & DS	7.1	6,602.50
18	Review of Historical Transactions	3.8	3,816.00
19	Case Management	0.6	795.00
20	General Mtgs with Debtor & Debtors' Prof	4.2	5,005.00
24	Preparation of Fee Application	14.3	12,507.50
28	Review of IAC Business Plan	2.9	2,767.00
GRAND TOTAL		158.9	\$ 156,621.50

EXHIBIT C

PURDUE PHARMA L.P., et al. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022

Task Category	Date	Professional	Hours	Activity
1	9/1/2022	Diaz, Matthew	1.1	Review Debtors' updated reporting analysis re: sales and cash.
1	9/1/2022	Diaz, Matthew	0.5	Review Debtors' Avrio analysis.
1	9/1/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/7/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/8/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/12/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/13/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/14/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/15/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/19/2022	Diaz, Matthew	0.3	Review updated injunction order.
1	9/19/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/20/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/21/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/22/2022	Diaz, Matthew	0.7	Review latest monthly operating report to evaluate performance.
1	9/22/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/23/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/27/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/28/2022	Diaz, Matthew	1.1	Review Debtors' latest reporting re: sales and cash.
1	9/29/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	9/30/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/3/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/5/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/6/2022	Diaz, Matthew	0.6	Review PI and voluntary injunction materials.
1	10/7/2022	Diaz, Matthew	0.8	Review Debtors' current operating results.
1	10/7/2022	Kurtz, Emma	0.5	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/11/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/12/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/13/2022	Diaz, Matthew	0.8	Review Debtors' latest operating results.
1	10/13/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/14/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/17/2022	Kurtz, Emma	0.6	Review recently uploaded dataroom documents re: Debtors' reporting to share with team.
1	10/17/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/18/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/19/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/20/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/21/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.

EXHIBIT C

PURDUE PHARMA L.P., et al. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022

Task Category	Date	Professional	Hours	Activity
1	10/24/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/24/2022	Kurtz, Emma	0.3	Review recently uploaded dataroom documents re: sales and cash flow reporting to share with team.
1	10/25/2022	Diaz, Matthew	0.9	Review Debtors' latest MOR.
1	10/25/2022	Diaz, Matthew	0.3	Review hearing summary re: case updates.
1	10/25/2022	Diaz, Matthew	0.9	Review Debtors' updated cash reporting.
1	10/25/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/26/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/27/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/28/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	10/31/2022	Diaz, Matthew	0.8	Review Debtors' updated sales reporting re: Purdue and Rhodes.
1	10/31/2022	Kurtz, Emma	0.3	Review recently uploaded dataroom documents re: reporting to share with team.
1	10/31/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/1/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/3/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/4/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/7/2022	Diaz, Matthew	1.4	Review August operating report to evaluate financial performance.
1	11/7/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/8/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/10/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/11/2022	Bromberg, Brian	0.9	Review monthly reporting report summary to provide comments.
1	11/11/2022	Diaz, Matthew	1.5	Review operating report presentation to the Committee.
1	11/11/2022	Kurtz, Emma	2.4	Prepare monthly operating report update for August.
1	11/11/2022	Kurtz, Emma	0.7	Prepare revisions to operating report update per comments from internal team.
1	11/11/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/15/2022	Bromberg, Brian	1.1	Edit monthly operating report summary.
1	11/15/2022	Diaz, Matthew	0.8	Review updated analysis of the Debtors' August operating report.
1	11/16/2022	Bromberg, Brian	1.1	Finalize monthly operating report summary to incorporate updates from call.
1	11/16/2022	Diaz, Matthew	0.6	Review updated draft financial report.
1	11/16/2022	Diaz, Matthew	0.7	Review Monitor's report.
1	11/21/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/23/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/28/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	12/5/2022	Diaz, Matthew	1.3	Review September operating report.
1	12/5/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	12/5/2022	Kurtz, Emma	0.6	Review recently uploaded dataroom documents re: reporting to share with team.
1	12/13/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	12/19/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1 Total			38.9	
2	9/9/2022	Diaz, Matthew	0.6	Review Debtors' latest cash flow reporting.
2	9/13/2022	Diaz, Matthew	0.7	Review Debtors' updated cash flow analysis.
2	11/7/2022	Diaz, Matthew	0.6	Review updated cash flow variance analysis.
2	11/11/2022	Diaz, Matthew	0.5	Review Debtors latest cash flow projections.
2	12/5/2022	Diaz, Matthew	0.7	Review latest budget to actual cash analysis.

EXHIBIT C

PURDUE PHARMA L.P., et al. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022

Task Category	Date	Professional	Hours	Activity
2	12/20/2022	Diaz, Matthew	0.8	Review Debtors' updated cash reporting.
2 Total			3.9	
6	9/22/2022	Bromberg, Brian	1.4	Review de minimis asset procedures.
6	9/23/2022	Bromberg, Brian	0.6	Prepare comments on de minimis asset sale procedures.
6	9/23/2022	Diaz, Matthew	0.8	Review proposed de minimis asset sale procedures.
6	9/30/2022	Bromberg, Brian	1.0	Review and send comments on asset sale procedures to Debtors.
6 Total			3.8	
7	9/7/2022	Bromberg, Brian	1.3	Review and investigate ANDA issues.
7	9/7/2022	Suric, Emil	0.8	Research Accord ANDA filing and potential for earlier than anticipated LOE.
7	9/9/2022	Diaz, Matthew	1.1	Review Debtors' updated business plan.
7	9/12/2022	Bromberg, Brian	0.9	Continue to evaluate potential ANDA issues.
7	9/13/2022	Bromberg, Brian	1.1	Review Debtors' latest business plan.
7	9/13/2022	Bromberg, Brian	0.7	Evaluate potential impact of ANDA issues on latest business plan.
7	9/13/2022	Bromberg, Brian	0.3	Review materials to prepare for call with Debtors' advisors re: ANDA issues.
7	9/13/2022	Bromberg, Brian	1.6	Review generics business plan to evaluate impact of ANDA issues.
7	9/13/2022	Bromberg, Brian	0.7	Discuss ANDA issues with Debtors and their advisors.
7	9/13/2022	Kurtz, Emma	0.7	Attend call with the Company and their advisors re: Accord update.
7	9/13/2022	Suric, Emil	0.7	Attend call with Debtors and advisors to discuss Accord patent challenge.
7	9/14/2022	Bromberg, Brian	0.5	Attend call with internal team re: ANDA issues.
7	9/14/2022	Bromberg, Brian	0.6	Prepare summary of ANDA issues.
7	9/14/2022	Bromberg, Brian	0.4	Finalize and send update on ANDA issues.
7	9/14/2022	Bromberg, Brian	0.5	Discuss ANDA issues with counsel.
7	9/14/2022	Diaz, Matthew	0.8	Review Oxycontin patent status.
7	9/14/2022	Diaz, Matthew	0.7	Review Debtors' updated business plan.
7	9/14/2022	Kurtz, Emma	0.5	Attend call with internal team to discuss business plan and patent litigation update.
7	9/14/2022	Suric, Emil	0.5	Attend call with counsel to discuss Accord patent challenge.
7	9/15/2022	Bromberg, Brian	1.4	Review business plan projections and potential impact of ANDA.
7	9/15/2022	Bromberg, Brian	0.5	Attend call with HL and BR to discuss ANDA issues.
7	9/15/2022	Bromberg, Brian	0.6	Review prior OxyContin forecasts.
7	9/15/2022	Bromberg, Brian	0.5	Prepare updated summary re: ANDA issues for working group.
7	9/15/2022	Diaz, Matthew	0.5	Participate in call with BR and Houlihan to discuss the Oxycontin patents.
7	9/15/2022	Diaz, Matthew	0.4	Draft correspondence to counsel re: Oxycontin patents.
7	9/15/2022	Kurtz, Emma	0.5	Attend call with Houlihan and Brown Rudnick to discuss patents.
7	9/16/2022	Diaz, Matthew	0.9	Prepare updates to summary for the Committee re: ANDA issues.
7	9/20/2022	Bromberg, Brian	0.4	Review FDA inspection and 483 response letter.
7	9/20/2022	Bromberg, Brian	0.8	Review ANDA summary for Committee to prepare updates.
7	9/20/2022	Bromberg, Brian	0.3	Finalize and send draft ANDA summary to the working group in advance of call.
7	9/20/2022	Bromberg, Brian	0.4	Review potential FDA inspection issues.
7	9/20/2022	Bromberg, Brian	0.6	Review latest business plan.
7	9/20/2022	Bromberg, Brian	0.6	Review business plan cash flow forecast.
7	9/20/2022	Bromberg, Brian	0.6	Discuss ANDA issues with working group.
7	9/20/2022	Diaz, Matthew	0.8	Review Purdue patent considerations.
7	9/21/2022	Bromberg, Brian	0.9	Finalize and send ANDA summary to AHC.
7	9/21/2022	Diaz, Matthew	0.6	Draft correspondence to Committee on certain issues in lieu of meeting.
7	9/22/2022	Bromberg, Brian	0.2	Coordinate call for FDA inspection issues.
7	9/23/2022	Bromberg, Brian	1.0	Attend call with team re: FDA inspection.
7	9/23/2022	Bromberg, Brian	0.9	Prepare summary of FDA inspection issues.
7	9/23/2022	Shafer, Patterson	1.0	Attend call with team to discuss FDA inspection and 483 response letter.
7	9/23/2022	Shafer, Patterson	0.5	Prepare analysis of 483 response letter and share with team.
7	9/26/2022	Bromberg, Brian	0.7	Draft AHC update on FDA issues.
7	9/26/2022	Bromberg, Brian	1.0	Edit FDA update based on comments from team.
7	9/26/2022	Bromberg, Brian	0.7	Provide further comments to Debtors on asset sale procedures.
7	9/27/2022	Bromberg, Brian	0.5	Finalize and send update on FDA inspection.
7	9/30/2022	Bromberg, Brian	0.4	Review Wilson business plan data.
7	9/30/2022	Bromberg, Brian	0.5	Review business plan backup information.
7	9/30/2022	Diaz, Matthew	1.5	Review updated business plan materials to evaluate changes.
7	10/3/2022	Bromberg, Brian	0.3	Review and send comments on asset sale procedures to Debtors.
7	10/4/2022	Diaz, Matthew	0.6	Review patent analysis.
7	10/5/2022	Shafer, Patterson	2.2	Review form 483 and Debtors response letter.
7	10/6/2022	Diaz, Matthew	1.1	Review Debtors' updated business plan information.
7	10/6/2022	Suric, Emil	0.5	Review Accord IPD analytics data.
7	10/14/2022	Diaz, Matthew	0.6	Review update re: Purdue's patents.

EXHIBIT C

PURDUE PHARMA L.P., et al. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022

Task Category	Date	Professional	Hours	Activity
7	11/1/2022	Bromberg, Brian	0.7	Prepare for financial advisors call with the Debtors' advisors re: operations updates.
7	11/1/2022	Bromberg, Brian	0.9	Prepare summary for counsel re: operations updates.
7	11/9/2022	Bromberg, Brian	0.2	Review marketing status for assets.
7	11/15/2022	Bromberg, Brian	0.7	Prepare for bi-weekly update call with the Debtors' advisors re: operations.
7	11/15/2022	Bromberg, Brian	0.7	Prepare operations summary for counsel.
7	11/22/2022	Bromberg, Brian	0.2	Review Avrio operating data.
7	11/26/2022	Bromberg, Brian	0.9	Review cash distributions analysis.
7	11/29/2022	Bromberg, Brian	0.4	Prepare for bi-weekly call with Debtors' advisors re: operations.
7	11/29/2022	Bromberg, Brian	0.3	Prepare summary of update call for team.
7	11/30/2022	Diaz, Matthew	0.9	Review Avrio materials provided by the Debtor.
7	11/30/2022	Diaz, Matthew	0.5	Participate in call with Houlihan re: operations update from the Debtors.
7	12/1/2022	Diaz, Matthew	0.6	Prepare for call with the Debtors re: strategic alternatives.
7	12/2/2022	Bromberg, Brian	0.7	Participate in update call with the Debtors' advisors re: Avrio.
7	12/2/2022	Bromberg, Brian	0.6	Prepare summary for clients of FA update call.
7	12/5/2022	Bromberg, Brian	0.5	Draft revised update for counsel on Avrio.
7	12/5/2022	Bromberg, Brian	0.7	Coordinate PHI update meeting for AHC.
7	12/12/2022	Bromberg, Brian	1.3	Review prior PHI update documents provided by the Debtors.
7	12/12/2022	Bromberg, Brian	0.6	Evaluate PHI budget under the plan.
7	12/12/2022	Diaz, Matthew	1.0	Participate in a call with the Debtors to discuss the PHI updates.
7	12/12/2022	Diaz, Matthew	1.3	Review materials to prepare for call on the PHI status.
7	12/12/2022	Diaz, Matthew	1.6	Provide comments to team re: update presentation on PHI for the working group.
7	12/12/2022	Kurtz, Emma	1.0	Attend call with the Company and their advisors re: PHI.
7	12/12/2022	Kurtz, Emma	0.9	Prepare revisions to PHI update presentation per comments from team.
7	12/12/2022	Kurtz, Emma	2.4	Prepare draft presentation re: PHI updates.
7	12/13/2022	Bromberg, Brian	0.5	Discuss Avrio update with Debtors.
7	12/13/2022	Bromberg, Brian	0.5	Review prior business plan projections re: Avrio.
7	12/13/2022	Diaz, Matthew	0.8	Attend call with working group to discuss PHI updates from the Debtors.
7	12/13/2022	Diaz, Matthew	0.7	Review Avrio analysis to provide comments to team.
7	12/13/2022	Diaz, Matthew	0.6	Participate in call case professionals to discuss company status.
7	12/13/2022	Kurtz, Emma	0.8	Attend call with working group to discuss PHI update.
7	12/14/2022	Bromberg, Brian	2.1	Review Avrio materials provided by Debtors.
7	12/14/2022	Bromberg, Brian	0.7	Draft questions list for the Debtors re: Avrio.
7	12/14/2022	Bromberg, Brian	0.5	Continue to review Avrio materials provided by Debtors.
7	12/14/2022	Diaz, Matthew	2.3	Conduct detailed review of the updated Avrio business plan.
7	12/14/2022	Kurtz, Emma	1.7	Review Avrio model and materials to draft observations and questions.
7	12/15/2022	Bromberg, Brian	0.4	Coordinate Avrio questions with Houlihan.
7	12/15/2022	Bromberg, Brian	0.7	Participate in call re: Avrio with Debtors advisors.
7	12/15/2022	Bromberg, Brian	0.9	Prepare summary of Avrio call for team.
7	12/15/2022	Diaz, Matthew	0.9	Review questions and related open items on the new business plan.
7	12/15/2022	Diaz, Matthew	0.7	Review updated Avrio analysis.
7	12/15/2022	Kurtz, Emma	0.7	Attend call with the Debtors' advisors re: Avrio.
7	12/16/2022	Bromberg, Brian	0.8	Review Avrio materials provided by the Debtors.
7	12/27/2022	Bromberg, Brian	0.9	Discuss R&D call with Debtors and team.
7	12/29/2022	Bromberg, Brian	1.6	Review Avrio presentation from the Debtors
7 Total			78.3	
11	11/16/2022	Bromberg, Brian	0.5	Participate in hearing re: fees.
11	11/16/2022	Diaz, Matthew	0.6	Attend (partial) the court hearing re fee applications and other topics.
11 Total			1.1	
16	9/13/2022	Diaz, Matthew	0.5	Participate in bi-weekly call with the Debtors' advisors to discuss current Company developments.
16	9/13/2022	Kurtz, Emma	0.3	Attend bi-weekly professionals call to discuss case status and emergence prep.
16	9/27/2022	Bromberg, Brian	0.6	Participate in call with Debtors' advisors re: case updates, including the business plan.
16	9/27/2022	Kurtz, Emma	0.4	Attend biweekly professionals call to discuss case updates and emergence preparation.
16	10/3/2022	Bromberg, Brian	1.2	Review prior summary of Sackler net assets.
16	10/5/2022	Bromberg, Brian	0.8	Review form 483.
16	10/6/2022	Bromberg, Brian	0.3	Review Purdue claims presentation.
16	10/6/2022	Bromberg, Brian	0.4	Review IPD analytics report.
16	10/7/2022	Bromberg, Brian	0.3	Review de minimis asset sale procedures.
16	10/10/2022	Bromberg, Brian	0.4	Review latest asset sale motion.
16	10/25/2022	Bromberg, Brian	0.6	Review analysis of Sackler net asset reports.
16	10/25/2022	Kurtz, Emma	0.7	Review net asset reports to evaluate update requests.
16	11/8/2022	Bromberg, Brian	0.2	Review Sackler asset reports.

EXHIBIT C

PURDUE PHARMA L.P., et al. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022

Task Category	Date	Professional	Hours	Activity
16	12/16/2022	Bromberg, Brian	0.4	Review Purdue de minimis sales.
16 Total			7.1	
18	9/2/2022	Diaz, Matthew	0.8	Review of Purdue case summaries.
18	9/26/2022	Bromberg, Brian	0.4	Review Sackler responses on net asset reports.
18	9/27/2022	Bromberg, Brian	1.1	Review Sackler net asset reports to evaluate information request.
18	9/27/2022	Bromberg, Brian	0.6	Draft suggested response re: updated net asset reports.
18	9/27/2022	Diaz, Matthew	0.6	Review of the Sackler information request and related reporting.
18	9/29/2022	Bromberg, Brian	0.3	Prepare updates to suggested response for net asset reports.
18 Total			3.8	
19	11/8/2022	Diaz, Matthew	0.6	Review of case open issues and related items.
19 Total			0.6	
20	11/1/2022	Bromberg, Brian	0.6	Participate in call with the Debtors' advisors re: business operations.
20	11/1/2022	Diaz, Matthew	0.8	Participate in call with the Debtors and the UCC to discuss case developments.
20	11/1/2022	Diaz, Matthew	0.5	Review materials to prepare for the call with the Debtors.
20	11/15/2022	Bromberg, Brian	0.5	Participate in b-weekly financial advisors call re: operations.
20	11/15/2022	Diaz, Matthew	0.7	Participate in call with the Debtor's and UCC's advisors to discuss business updates.
20	11/29/2022	Bromberg, Brian	0.5	Participate in bi-weekly call with Debtors' advisors re: operations updates.
20	11/29/2022	Diaz, Matthew	0.6	Participate in call with the Debtors' and UCC's advisors re: case updates.
20 Total			4.2	
24	10/1/2022	Kurtz, Emma	2.4	Prepare draft August fee application per local rules.
24	10/4/2022	Diaz, Matthew	0.6	Review draft August fee application.
24	10/11/2022	Kurtz, Emma	2.3	Prepare ninth interim fee application per local rules.
24	10/13/2022	Diaz, Matthew	0.9	Review ninth interim fee application.
24	10/25/2022	Kurtz, Emma	1.6	Begin to prepare September fee application per local rules.
24	10/26/2022	Kurtz, Emma	1.4	Finish preparing draft September fee application per fee examiner guidance.
24	11/1/2022	Diaz, Matthew	0.6	Review draft September fee application.
24	11/15/2022	Diaz, Matthew	0.3	Review of the 9th interim application.
24	12/7/2022	Kurtz, Emma	1.8	Prepare draft October fee application per local rules.
24	12/18/2022	Kurtz, Emma	1.7	Prepare draft November 2022 fee statement.
24	12/19/2022	Diaz, Matthew	0.7	Review draft November fee statement.
24 Total			14.3	
28	9/6/2022	Bromberg, Brian	0.9	Review previously provided IAC information.
28	9/6/2022	Bromberg, Brian	1.0	Participate in call with IAC management re: financial updates.
28	9/6/2022	Bromberg, Brian	0.4	Summarize IAC call for team and Houlahan.
28	9/12/2022	Diaz, Matthew	0.6	Review IAC operating results.
28 Total			2.9	
Grand Total			158.9	

EXHIBIT D**PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649****SUMMARY OF EXPENSES****FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022**

Expense Type	Amount
Other	\$ 8.00
Grand Total	\$ 8.00

EXHIBIT E

PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649

EXPENSE DETAIL

FOR THE PERIOD SEPTEMBER 1, 2022 TO DECEMBER 31, 2022

Date	Professional	Expense Type	Expense Detail	Amount
9/20/2022	Bromberg, Brian	Other	Flight internet charge to complete case work.	8.00
		Other Total		\$ 8.00
		Grand Total		\$ 8.00